

## APPENDIX A

PARTICULAR STATEMENTS OF INTEREST  
OF THE AMICI

The National Council of Churches of Christ in the U.S.A. (NCC) is a community of thirty-two religious communions numbering over 40 million members. All of these communions—through their representatives on the Governing Board of the NCC—support the right of religious bodies to engage in efforts to share their message with others. The NCC joins this brief in support of the right of a religious body to share its message freely without fear of crippling punitive damages.

The National Association of Evangelicals is a non-profit association of evangelical Christian organizations, including fifty thousand churches from seventy-seven denominations. NAE, which represents a constituency of fifteen million people, serves a broad cross-section of churches for the purpose of a united voice and action.

The Catholic League for Religious and Civil Rights (League) is a non-profit voluntary association, national in membership, organized to promote good will and harmonious relations in the community, to combat all forms of religious prejudice and discrimination, and to defend the rights and sanctity of each human life. The League is concerned with the grave threat to the religious freedom rights of all religious groups that is posed by the imposition of punitive damages for alleged emotional injuries.

The Christian Legal Society is a non-profit professional association of 3,500 Christian judges, attorneys, law professors and law students, founded in 1961. The Center for Law and Religious Freedom is a division of the Christian Legal Society, founded in 1975 to protect the free exercise of religion, supporting the appropriate accommodation by the state of religious beliefs and prac-

tices and the respect for religious rights as required by the First Amendment. The Center has taken an active role in cases where claimants improperly filed tort claims and sought punitive damages against churches. It believes that churches and synagogues are entitled to no less protection in the exercise of their First Amendment freedom than commercial enterprises in the operation of a business.

The Coalition for Religious Freedom (CRF) is a non-profit, tax-exempt educational organization incorporated in the District of Columbia in 1984. Originally begun as a coalition of evangelical and independent Christian churches, CRF now includes Americans of all faiths. In addition to its research and education about church-state issues in the United States, the Coalition offers advice and mediation to persons involved in disputes over religious liberty issues. CRF has a vital interest in the standards under which courts may impose tort liability for religiously motivated acts.

The Council on Religious Freedom (Council) is a non-profit corporation formed to uphold and promote the principle of religious liberty. The Council's objectives and purposes include promoting the constitutional principle of free exercise of religion, opposing any encroachment by governmental agencies, including the judicial branch of government, which would limit or tend to inhibit such exercise, and responding to other acts interfering with the full exercise of religious freedom. The Council is a membership organization, with dues-paying members throughout the United States. The Board of Directors is composed of individuals who are active in religious affairs. Some of the Directors serve in an official capacity in a religious organization, others on a lay basis. All the Directors recognize the importance of preserving and promoting the right of religious organizations to carry out their ministries free from governmental intrusion, whether that interference be from the executive, legislative, or judicial branches of the government. The

Council speaks to the legal issues raised by this litigation because punitive damages have now become a weapon to destroy churches in violation of the due process clause.

The Unitarian Universalist Association is a voluntary religious association of 1,000 congregations in the United States. The Association frequently intervenes in cases where important First Amendment rights are at stake. This case in particular affords the Court the opportunity to clarify the procedural rights secured to religious bodies in suits arising in a First Amendment context.